

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

MAR 17 2020

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIELLE L. DOWLING,

a/k/a Dee,

LINDA L. BOW,

JOSH STOOPS,

JAMES BACON,

a/k/a Jay,

MICHEAL FISHER,

STEVE ANDERSON,

a/k/a Crook,

JAMES SWARTZ,

ERIC POORE,

a/k/a Hollywood,

JANNA BROADDUS,

JOSH T. UNGER,

a/k/a J.T.,

RYAN SAWYERS,

a/k/a Ogre,

TROY THORNTON,

a/k/a Capone,

DARIUS ANTHONY GARCIA,

a/k/a Roger,

AMBER L. SEATS

JEREMY OSMON,

TYLER GREENWALT,

GUY KARNES,

CLIFFORD R. KING, JR.,

a/k/a Zoe,

LISA ROTH,

ERIC WALKER,

a/k/a Little E,

DYLAN WILLIAMS,

a/k/a D,

JEFFREY SACKS, and

PAULA ADAMS,

Defendants,

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CAUSE NO. 1:20-cr- -01

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INDICTMENT

COUNT ONE

[Conspiracy to Distribute Controlled Substances – 21 U.S.C. § 846]

The Grand Jury charges that:

From on or about December 18, 2019 through March 17, 2020, in the Southern District of Indiana, Indianapolis Division, and elsewhere, DANIELLE L. DOWLING, a/k/a Dee, LINDA L. BOW, JOSH STOOPS, JAMES BACON, a/k/a Jay, MICHEAL FISHER, STEVE ANDERSON, a/k/a Crook, JAMES SWARTZ, ERIC POORE, a/k/a Hollywood, JANNA BROADDUS, JOSH T. UNGER, a/k/a J.T., RYAN SAWYERS, a/k/a Ogre, TROY THORNTON, a/k/a Capone, DARIUS ANTHONY GARCIA, a/k/a Roger, AMBER L. SEATS, JEREMY OSMON, TYLER GREENWALT, GUY KARNES, CLIFFORD R. KING, JR., a/k/a Zoe, LISA ROTH, DYLAN WILLIAMS, a/k/a D, ERIC WALKER, a/k/a Little E, and JEFFREY SACKS, did knowingly and intentionally conspire together and with other persons, known and unknown to the Grand Jury, to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

OBJECTS OF THE CONSPIRACY

The charged conspiracy had the following objects:

1. The distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Non-Narcotic controlled substance.

2. The distribution of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic controlled substance.

MANNER AND MEANS

The charged conspiracy operated in the following manner:

1. DANIELLE L. DOWLING, a/k/a Dee, a resident of Indianapolis, Indiana, was the leader of a drug trafficking organization that distributed methamphetamine and heroin in the Indianapolis area.
2. LINDA L. BOW ("BOW") transported methamphetamine and heroin to DOWLING's drug customers at DOWLING's direction.
3. JOSH STOOPS ("STOOPS"), JAMES BACON, a/k/a Jay ("BACON"), MICHEAL FISHER ("FISHER"), STEVE ANDERSON, a/k/a Crook ("ANDERSON"), JAMES SWARTZ ("SWARTZ"), ERIC POORE, a/k/a Hollywood ("POORE"), JANNA BROADDUS ("BROADDUS"), JOSH T. UNGER, a/k/a J.T. ("UNGER"), RYAN SAWYERS, a/k/a Ogre ("SAWYERS"), TROY THORNTON, a/k/a Capone ("THORNTON"), DARIUS ANTHONY GARCIA, a/k/a Roger ("GARCIA"), AMBER L. SEATS ("SEATS"), JEREMY OSMON ("OSMON"), TYLER GREENWALT ("GREENWALT"), and GUY KARNES ("KARNES") distributed methamphetamine for DOWLING.
4. CLIFFORD R. KING, JR., a/k/a Zoe ("KING"), LISA ROTH ("ROTH"), and Christopher Tate ("Tate") (not a defendant herein) supplied DOWLING with methamphetamine for distribution. KING also supplied DYLAN WILLIAMS, a/k/a D, with methamphetamine for distribution.

5. ERIC WALKER, a/k/a Little E ("WALKER"), supplied KING with methamphetamine for distribution.

6. JEFFREY SACKS ("SACKS") brokered methamphetamine transactions between ROTH and DOWLING.

7. Throughout the conspiracy, the defendants used telephones to facilitate the drug trafficking operation. The defendants spoke on telephones using code language to discuss their drug trafficking operation.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, that is to distribute methamphetamine and heroin, the members of the conspiracy did commit, among others, the following overt acts:

1. On December 19, 2019, DOWLING obtained approximately five ounces of methamphetamine from a drug runner working for Tate. The transaction occurred at the America's Best Value Inn Hotel located at 3401 South Keystone Avenue in Indianapolis.

2. On January 10, 2020, DOWLING delivered approximately one ounce of methamphetamine to STOOPS for redistribution.

3. On January 11, 2020, STOOPS possessed approximately one-half ounce of methamphetamine, heroin, fentanyl, digital scales, and a firearm on the 2600 block of Shelby Street in Indianapolis.

4. On January 11, 2020, at DOWLING's direction, BOW delivered approximately two and one-half ounces of methamphetamine to BACON at the Casino Lounge, located at 1711 East Minnesota Street in Indianapolis. BACON

intended to distribute two of these ounces of methamphetamine and consume the remaining one-half ounce of methamphetamine.

5. On January 12, 2020, KING delivered more than one pound of methamphetamine to DOWLING at a residence located at 10304 Lyric Drive in Indianapolis.

6. On January 12, 2020, at the direction of DOWLING, BOW delivered approximately one pound of methamphetamine to FISHER for redistribution.

7. On January 12, 2020, ANDERSON and an individual known as "Big Johnny" used the threat of force to collect money that one of DOWLING's methamphetamine customers owed her. DOWLING agreed to deliver methamphetamine to ANDERSON and heroin to "Big Johnny" when they brought the money to DOWLING.

8. On January 13, 2020, at the direction of DOWLING, BOW delivered approximately three ounces of methamphetamine to SWARTZ for redistribution.

9. On January 13, 2020, ANDERSON warned DOWLING about police surveillance activity occurring outside of her residence.

10. On January 13, 2020, DOWLING delivered approximately two ounces of methamphetamine to POORE for redistribution.

11. On January 15, 2020, DOWLING agreed to send BOW to front one ounce of methamphetamine to ANDERSON for redistribution.

12. On January 17, 2020, DOWLING offered to sell one-half pound of methamphetamine to OSMON for \$1,800.

13. On January 19, 2020, at the direction of DOWLING, BOW delivered approximately two ounces of meth to BROADDUS for redistribution.

14. On January 23, 2020, DOWLING delivered approximately one ounce of methamphetamine to UNGER for redistribution. The transaction occurred at a residence located at 10304 Lyric Drive in Indianapolis.

15. On January 23, 2020, POORE asked DOWLING to supply him with one pound of methamphetamine.

16. On January 24, 2020, DOWLING delivered approximately two ounces of methamphetamine to SWARTZ for redistribution at a gas station located near the intersection of Interstate 70 and Emerson Avenue in Indianapolis.

17. On January 24, 2020, KING delivered approximately one pound of methamphetamine to DOWLING at a residence located at 10304 Lyric Drive in Indianapolis.

18. On January 24, 2020, at the direction of DOWLING, BOW delivered approximately four ounces of methamphetamine to SAWYERS for redistribution.

19. On January 24, 2020, at the direction of DOWLING, BOW delivered approximately 66 grams of methamphetamine to THORNTON for redistribution.

20. On February 4, 2020, DOWLING delivered approximately six ounces of methamphetamine to GARCIA at a residence located at 6062 Laurel Hall Drive in Indianapolis. SEATS brokered the transaction between DOWLING and GARCIA.

21. On February 5, 2020, OSMON delivered approximately one ounce of methamphetamine to a confidential informant ("Individual #1") at a parking lot outside of a building located at 681 Twin Aire Drive in Indianapolis.

22. On February 8, 2020, KING fronted approximately one-half pound of methamphetamine to WILLIAMS for redistribution.

23. On February 10, 2020, KING fronted approximately one-half pound of methamphetamine to WILLIAMS for redistribution.

24. On February 10, 2020, DOWLING delivered approximately 20 grams of methamphetamine and 20 grams of heroin to GREENWALT for redistribution.

25. On February 17, 2020, KING delivered approximately one-eighth ounce of methamphetamine and one-eighth ounce of heroin to ADAMS.

26. On February 21, 2020, Tate possessed approximately five pounds of methamphetamine. Tate intended to deliver two pounds of the methamphetamine to Dowling for redistribution.

27. On February 22, 2020, WALKER delivered approximately one pound of methamphetamine to KING for redistribution.

28. On February 25, 2020, ROTH delivered approximately one pound of methamphetamine to DOWLING and SAWYERS inside Room 210 of the

Motel 6 located at 4585 South Harding Street in Indianapolis. SACKS brokered the transaction between ROTH and DOWLING.

29. On March 5, 2020, DOWLING delivered approximately one ounce of methamphetamine to KARNES for redistribution.

30. On March 6, 2020, KARNES ordered three ounces of methamphetamine from DOWLING.

COUNT TWO

[Possession of Methamphetamine With Intent to Distribute – 21 U.S.C. § 841(a)(1)]

The Grand Jury further charges that:

On or about January 11, 2020, within the Southern District of Indiana, Indianapolis Division, JOSH STOOPS did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II, Non-Narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

[Possession of a Firearm by a Convicted Felon – 18 U.S.C. § 922(g)(1)]

The Grand Jury further charges that:

On or about January 11, 2020, within the Southern District of Indiana, Indianapolis Division, JOSH STOOPS, knowing that he had been convicted of a

crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm; to-wit, STOOPS possessed one .25 caliber Tanfoglio Model GT27 semiautomatic pistol bearing serial number MI36168, following a conviction for Possession of a Narcotic Drug, a Class D Felony, in Boone County, Indiana, on or about October 8, 2004, said firearm having been shipped and transported in interstate commerce.

All in violation of Title 18 United States Code, Section 922(g)(1).

COUNT FOUR

[Distribution of Methamphetamine – 21 U.S.C. § 841(a)(1)]

The Grand Jury further charges that:

On or about January 11, 2020, within the Southern District of Indiana, Indianapolis Division, JOSH STOOPS did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II, Non-Narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about February 17, 2020, within the Southern District of Indiana, Indianapolis Division, CLIFFORD R. KING, JR., a/k/a Zoe, and PAULA ADAMS did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances

Act; to-wit, ADAMS communicated with KING via cellular telephone and ordered methamphetamine and heroin for distribution, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATIONS

1. The allegations in Counts One through Five of this Indictment are realleged as if fully set forth here, for the purpose of giving the defendants notice of the United States' intent to seek forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

2. If convicted of the offenses set forth in Counts One through Five of this Indictment, DANIELLE L. DOWLING, a/k/a Dee, LINDA L. BOW, JOSH STOOPS, JAMES BACON, a/k/a Jay, MICHEAL FISHER, STEVE ANDERSON, a/k/a Crook, JAMES SWARTZ, ERIC POORE, a/k/a Hollywood, JANNA BROADDUS, JOSH T. UNGER, a/k/a J.T., RYAN SAWYERS, a/k/a Ogre, TROY THORNTON, a/k/a Capone, DARIUS ANTHONY GARCIA, a/k/a Roger, AMBER L. SEATS, JEREMY OSMON, TYLER GREENWALT, GUY KARNES, CLIFFORD R. KING, JR., a/k/a Zoe, LISA ROTH, ERIC WALKER, a/k/a Little E, DYLAN WILLIAMS, a/k/a D, JEFFREY SACKS, and PAULA ADAMS shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses of which he or she is convicted, and any and all property used or

intended to be used in any manner or part to commit and to facilitate the commission of the offenses of which he or she is convicted.

3. If convicted of the offenses set forth in Counts One through Five of this Indictment, DANIELLE L. DOWLING, a/k/a Dee, LINDA L. BOW, JOSH STOOPS, JAMES BACON, a/k/a Jay, MICHEAL FISHER, STEVE ANDERSON, a/k/a Crook, JAMES SWARTZ, ERIC POORE, a/k/a Hollywood, JANNA BROADDUS, JOSH T. UNGER, a/k/a J.T., RYAN SAWYERS, a/k/a Ogre, TROY THORNTON, a/k/a Capone, DARIUS ANTHONY GARCIA, a/k/a Roger, AMBER L. SEATS, JEREMY OSMON, TYLER GREENWALT, GUY KARNES, CLIFFORD R. KING, JR., a/k/a Zoe, LISA ROTH, ERIC WALKER, a/k/a Little E, DYLAN WILLIAMS, a/k/a D, JEFFREY SACKS, and PAULA ADAMS shall also forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any of the offenses of which he or she is convicted.

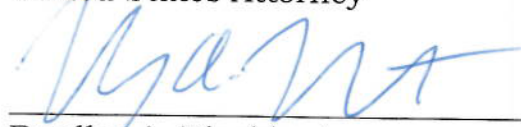
A TRUE BILL:



FOREPERSON

JOSH J. MINKLER
United States Attorney

By:


Bradley A. Blackington
Assistant United States Attorney